



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 28, 2023

**BY ECF**

The Honorable Colleen McMahon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Sabitri Laforest et al.*, 21 Cr. 272 (CM)**

Dear Judge McMahon:

On February 7, 2023, change of plea hearings were conducted for defendants Sabitri and Garry Laforest before the Hon. Ona T. Wang, U.S. Magistrate Judge, pursuant to this Court's referral. Judge Wang recommended that the Court accept the pleas. On February 21, 2023, change of plea hearings were conducted for defendants Tatiana and Sanjay Laforest before the Hon. Valerie Figueredo, U.S. Magistrate Judge, pursuant to this Court's referral. Judge Figueredo recommended that the Court accept the pleas.

I have attached to this letter: (1) the transcripts for each change of plea proceeding, (2) a Proposed Order accepting the defendants' respective guilty pleas to Count Two of the Indictment, and (3) the plea agreements for each defendant. The Government respectfully requests that the Court accept each defendant's plea of guilty and enter the attached Proposed Order.

The Government further requests that the Court set sentencing dates for each defendant. None of the defendants is presently detained.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/ Matthew R. Shahabian  
Matthew R. Shahabian  
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cc: Counsel of Record (by ECF)